64240-67

06 25 2012



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Christina M Swick Agent for Combat Insect Control Systems c/o Lewis and Harrison LLC 122 C Street NW Suite 740 Washington DC 20001

JUN 2 5 2012

Subject Application for Pesticide Notification EPA Registration Number 64240 67 Date of Submission June 8 2012

Dear Registrant

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PRN) 98 10 dated June 8 2012 for the abovementioned product The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98 10 and finds that the actions requested fall within the scope of PRN 98 10 The label submitted with the application has been stamped Notification and will be placed in our records

If you have any questions regarding this letter please contact Clayton Myers at (703) 347 8874 or via email at <u>myers clayton@epa gov</u>

Sincerely

fer Richard Gebken Product Manager Insecticide Branch Registration Division (7505P)

Enclosures

Copy of Label Stamped Notification

	((zl
lease read instructions on reverse b	efore completing form United Sta nvironmental Prote Washington Di	ection Agency	🗌 Registi	ration	0060 Approval expires 05 31 98 OPP Identifier Number
	Applı	cation for Pe	sticide Section	n I	
1 Company/Product Number 64240 67		Richard	2 EPA Product Manager Richard Gebken		3 Proposed Classification
4 Company/Product (Name) Combat Flik R		PM# 10			
5 Name and Address of Applicant c/o Henkel Consumer Goods I 19001 N Scottsdale Rd Scottsdale AZ 85255 NOTE PLEASE SEND ALL CO CONTACT POINT LISTED B	(b)(l) m to EPA R	6 Expedited Review In accordance with FIFRA Section 3(c)(3) (b)(1) my product is similar or identical in composition and labeling to EPA Reg No Product Name			
Check if this is a new	address	Sectio			
Notification in Accordance With F other changes have been made to willfully make my false statement	w hal page(s) If necess ION OF ALTERNA PR Notice 98 10 This notifie the labeling or the confider to EPA I further understa	ary (For Section ATE BRAND cation is consistent with initial statement of for ind that if this notific	Me Too Applic Other Explain On I and Section II NAME Combat Ath the provisions of PR mula of this product I un ation is not consistent wi	ation below) Max Roach H Notice 98 10 EPA re inderstand that it is a t th the terms of PR No	Agency letter dated Cilling Bait Strips ulations at 40 CFR 152 46 and no violation of 18 U S C Sec 1001 to otice 95 2 and 40 CFR 152 46 this
product may be in v	iolation of FIFRA and I may	y be the subject to en Sectio		nities under sections	12 and 14 of FIFRA
Material This Product Will Be Child Resistant Packaging Yes No	Packaged In Unit Packaging Yes No If Yes	No per	Water Soluble Packaging Yes No If Yes No per		2 Type of Container Metal Plastic Glass
*Certification must be submitted	Unit Packaging w	gt container	Package wgt	container	Paper Other (Specify)
	Container		On Label		of Label Directions
6 Manner in Which Label is Affixed to Product ☐ Lithograph ☐ Other ☐ Paper glued ☐ Stenciled					
		Sectio	n – IV		
1 Contact Point (Complete items Name Georgia Anastasiou Lewi 122 C St NW #740 Washii	s & Harrison LLC	Title	to be contacted if nec mbat Insect Cont	Т	this application) elephone No (Include Area Code) 202 393 3903 ext 19
I certify that the statements I hav acknowledge that any knowingly under applicable law	Certif e made on this form and	ication all attachments the	ereto are true accurate	and complete I	6 Date Application Received (Stamped)
		3 Title Agent for	Fitle Agent for Combat Insect Control System		
4 Typed Name 5 Georgia Anastasiou Lewis & Harrison LLC		5 Date	Date June 8 2012		

EPA Form 8570 1 (Rev 8 94) Previous editions are obsolete

White EPA File Copy (original) Yellow Applicant Copy



122 C Street N W Suite 740 Washington D C 20001 telephone 202 393 3903 fax 202 393 3906

June 8 2012

HAND DELIVERED

Document Processing Desk [NOTIF] Office of Pesticide Programs (7504P) U S Environmental Protection Agency Room S 4900 One Potomac Yard 2777 South Crystal Drive Arlington VA 22202 4501

ATTENTIONRichard Gebken
Product Manager, Team 10SUBJECTCombat Insect Control Systems
Combat® Flik R (EPA Reg No 64240 67)
Notification per PR Notice 98 10 Alternate Brand Name

Dear M1 Gebken

On behalf of Combat Insect Control Systems I am submitting a notification to propose the following alternate brand name for the product Combat® Flik R (EPA Reg No 64240 67)

Combat Max Roach Killing Bait Strips

In support of this submission enclosed please find an Application for Pesticide Notification which includes a signed statement certifying compliance with PR Notice 98 10 and one copy of the EPA label

If you have any questions about this submission please call me at 202 393 3903 ext 19 or e mail me at georgia@lewisharrison.com

Sincerely

Georgia anastasion

Georgia Anastasiou Agent for Combat Insect Control Systems

NOTIFICATION

Combat[®] Flik R

JUN 2 5 2012

Approved Alternate Brand Name [Combat Roach Kıllıng Bait Strips] (Approved 7/25/2011)

[Combat Max Roach Killing Bait Strips]

Place holder for an illustration of the product

Place holder for an illustration of small and/or large roaches - may be on front or back or side panels

USE ONLY IN AREAS INACCESSABLE TO CHILDREN AND PETS KEEP OUT OF REACH OF CHILDREN CAUTION

See [side] [and][or] [back] [panel] [of pouch] for additional precautionary statements and directions

 ACTIVE INGREDIENT
 Fipronil[†]
 0 01%

 OTHER INGREDIENTS
 99 99%

 TOTAL
 100 00%

 [†]CAS No 120068 37 3
 100 00%

Contains 6 [to] [-] 24 [Gel] [Bait] [Strips] [Each Containing][] [0 07 oz (2 0 g) [to][-] 0 14 oz (4 0 g)] [TOTAL] NET WT[] 0 42 oz (12 0 g) [to][-] 3 39 oz (96 0 g)

EPA Reg No 64240 67 EPA Est No _____

[Manufactured for] [Distributed by] & ©[2012] [2013] [2014] Combat Insect Control Systems [19001] [N Scottsdale Rd] Scottsdale [AZ] [ARIZONA] 85255 MADE IN [USA][KOREA]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION Keep [gel] bait strips away from foods and food contact surfaces Harmful if absorbed through skin Causes moderate eye irritation Avoid contact with skin eyes and clothing Wash thoroughly with soap and water after handling and before eating drinking chewing gum or using tobacco

FIRST AID

If on Skin or Clothing Take off contaminated clothing Rinse skin immediately with plenty of soap and water for 15 to 20 minutes Call a poison control center or doctor for treatment advice

If in Eyes Hold eye open rinse slowly and gently with water for 15 to 20 minutes Remove contact lenses if present after the first 5 minutes then continue rinsing eye Call a poison control center or doctor for treatment advice Have the product container or label with you when calling a poison control center or doctor or going for treatment

PHYSICAL OR CHEMICAL HAZARDS Do not use this product in or on electrical equipment due to the possibility of a shock hazard

STORAGE AND DISPOSAL Do not contaminate water food or feed by storage or disposal **STORAGE** Store in a cool dry area out of reach of children **DISPOSAL**

If empty Nonrefillable container Do not reuse or refill this container Offer for recycling if available If recycling is not available place in trash

If partly filled Call your local solid waste agency for disposal instructions Never place unused product down any indoor or outdoor drain

{Note to Reviewer Per PR Notice 2007-4, this product will receive a batch code The batch code number will appear on each bait strip }

For front or back or side panel

[Satisfaction guaranteed] [Guaranteed to work] [or your money back][']

[EFFECTIVENESS GUARANTEED COMBAT[®] [Insect Control Systems] stands behind this [insect killing system] [product] with a full [Satisfaction] Guarantee Should you have any questions regarding COMBAT[®] [baits] [products] please call 1 800 426 6228]

[For information call the Combat[®] [Labs] [Information] Helpline at 1 800 426 6228] [For questions or comments please call the Combat[®] [Labs] [Information] Helpline at 1 800 426 6228 [for information]

[[] [[The] [Paperboard in this] Carton [contains] [is made from] _____% Recycled fiber [minimum % post consumer content]] [PLEASE RECYCLE EMPTY CARTON]



DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling Do not use for control of insects other than those listed on this label

[[Combat Flik R] [This product] may be used for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in residential areas]

[GENERAL INFORMATION]

[[This product] [Combat Flik R] provides fast control of roaches]

[[This product] [Combat Flik R] is formulated to effectively control roaches]

[[That s because] [This product] [*Combat Flik R*] [has] [contains] Fipronil [a [fast acting] [fast killing] active ingredient]][] [[Its speed is] [That s] [[still] slow enough for [exposed] [foraging] [roaches] [the roaches you see] to return to the nest [where] [so] [that] [[roach] nestmates] [other roaches] [roaches in the nest] are [also] exposed to the insecticide [and] [so] [that] the entire nest is [killed] [destroyed] [through] [by] [the Domino EffectTM]]

[[This is] [How] [This Product] [Combat Flik R] Works]

- [•][1] [Roaches [visit] [find] the [gel] [bait][s] [strips] and [eat] [feed on] the [gel] bait]
- [•][1] [This product attracts [foraging] roaches [to the [insecticide] [gel] bait strip][s][][and] [the]
 - [Roaches] [feed on] [eat] [are exposed to] the [gel] [bait][s] [strips]]
- [•][2] [[Exposed] Roaches carry [the] [gel] [bait] [insecticide] back [on and in their bodies] to [the] [nest] [where] [so] [that] [[roach] nestmates] [other roaches] [roaches in the nest] are exposed to the insecticide [and] [so] [that] the entire nest is [killed] [destroyed]]
- [] [Do not interfere with [the] roaches or [the] [product] [gel] [bait][s] [strips] during use]
- [] [[Replace] [Place more] [gel] [bait][s] [strips] if roaches return]
- [] [Do not use sprays on or around [the] [product] [gel] [bait][s] [strips] [placements]]
- [] [Do not use strong cleaners around [the] [product] [gel] [bait][s] [strips] [placements]]
- [*] [Do not use sprays or strong cleaners on or around [the] [product] [gel] [bait][s] [strips] [placements]]
- [] [Place [the] [product] [gel] [bait][s] [strips] out of reach of children and pets]

DIRECTIONS FOR USE (continued)

For indoor and outdoor (adjacent to [the home][homes & structures]) use

- [1] Break [bait] strips apart [See] [Illustration A] [Picture A] [Figure [1][A]]
- [2] [To] place [a] [gel] batt[s] [strip[s]] [securely] [in a chosen location] indoors or outdoors (adjacent to the home) peel off [protective] [covering][tape][film] [on the bottom of the strip] [marked] [Remove to Adhere] [See] [Illustration B] [Picture B] [Figure [2][B]]
- [3] [Stick][Adhere] [it] [the exposed side] [the strip] to [a] clean surface [[The] [D][d]iagram[s] [above] [below] [at right] [at left] show[s] recommended placement locations] [See [I]]ustration C] [Busture C] [Figure [2][C]] [cf] [fee] [showing] [cel] [beit] strip hefere

[See [Illustration C] [Picture C] [Figure [3][C]] [of] [for] [showing] [gel] [bait] strip before peeling off [covering] [tape] [film]

Discard [the] [covering] [tape] [film] in the trash

Use all bait strips [at one time]

[4] To activate [a] [gel] [bait] strip [already stuck to a clean surface] peel off the [protective] [covering] [tape] [film] [on top of the strip] [marked] [Peel Here]

[See [Illustration C] [Picture C] [Figure [3][C]] [of] [for] [showing] [gel] [bait] strip ready to be activated]

[See [Illustration D] [Picture D] [Figure [4][D]] [of] [for] [showing] [shows] [a] strip being activated]

[Discard [the] [removed] [covering] [tape] [film] in the trash]

Do not use in beehives

[TIPS]

- [Do not spray insecticide on or around [the] [bait][s] [strip][s][] as sprays will contaminate [bait][s] [strip][s] and reduce effectiveness]
- Replace [strips] after 3 months

[Discard [used] [old] [replaced] strips [to be replaced] [by placing] in [the] trash]

[Note to reviewer Label may include alternate usage instructions outlined below instead of those listed above The only difference is how the adhesive is placed on the strip]

- [1] Break [bait] strips apart [See] [Illustration A] [Picture A] [Figure [1][A]]
- [2] [To] place [a] [gel] bait[s] [strip[s]] [securely] [in a chosen location] indoors or outdoors (adjacent to the home) remove adhesive tab from pouch and adhere to [bottom of] strip [marked Place <u>Sticker Here]</u> [See] [Illustration B alt] [Picture B alt] [Figure [2 alt][B alt]] Peel off [protective] [covering][tape][film] [on the bottom of the strip] [marked] [Remove to Adhere] [See] [Illustration B] [Picture B] [Figure [2][B]]
- [3] [Stick][Adhere] [it] [the exposed side] [the strip] to [a] clean surface [[The] [D][d]iagram[s] [above] [below] [at right] [at left] show[s] recommended placement locations]

[See [Illustration C] [Picture C] [Figure [3][C]] [of] [for] [showing] [gel] [bait] strip before peeling off [covering] [tape] [film]

8/15

Discard [the] [covering] [tape] [film] in the trash

Use all bait strips [at one time]

[4] To activate [a] [gel] [bait] strip [already stuck to a clean surface] peel off the [protective] [covering] [tape] [film] [on top of the strip [marked] [Peel Here]

[See [Illustration C] [Picture C] [Figure [3][C]] [of] [for] [showing] [gel] [bait] strip ready to be activated]

[See [Illustration D] [Picture D] [Figure [4][D]] [of] [for] [showing] [shows] [a] strip being activated]

[Discard [the] [removed] [covering] [tape] [film] in the trash]

Do not use in beehives

[TIPS]

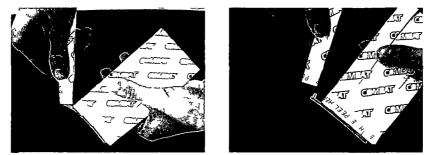
[Do not spray insecticide on or around [the] [bait][s] [strip][s][] as sprays will contaminate [bait][s] [strip][s] and reduce effectiveness]

Replace [strips] after 3 months

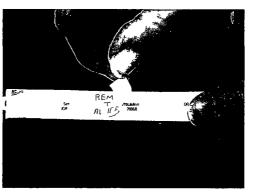
[Discard [used] [old] [replaced] strips [to be replaced] [by placing] in [the] trash]

4/15

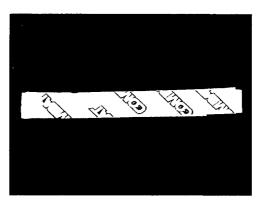
DIRECTIONS FOR USE (continued)



[Illustration A] [Picture A] [Figure [1][A]]

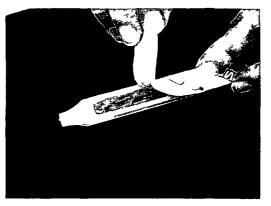


[Illustration B] [Picture B] [Figure [2][B]]

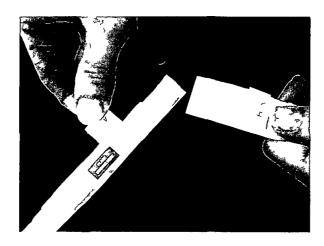


[Illustration C] [Picture C] [Figure [3][C]]

10/15

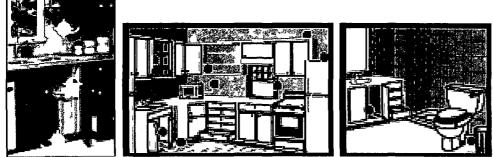


[Illustration D] [Picture D] [Figure [4][D]]



[Illustration B alt] [Picture B alt] [Figure [2 alt][B alt]]

[Note to reviewer Label may include graphic depictions of recommended placement locations]



Example illustration of suggested bait strip placement sites

Optional claims for front or back or side panel of label

- 1 [Easy to use] [Easy to use]
- 2 Easy to apply [anywhere]
- 3 [Leaves] no [messy] [residue] [or] [messy clean up]
- 4 [There s] no [residue] [or] [mess to clean up]
- 5 Convenient
- 6 [Mess free] [Mess free]
- 7 No mess
- 8 No [vapors][] [fumes] [or] [mess]
- 9 [Kills] [Stops] [Eliminates] roaches [without] [messy] [residue] [and] [without insecticide] odors [and] [or] [fumes]
- 10 Works [without] [messy] [residue] [and] without [insecticide] odors [or fumes]
- 11 [This] [product is] [gel] [bait] [strip][s] [are] easy to use [and [has] [have] no insecticide odor]
- 12 No insecticide odor
- 13 [It s] [the] [clean][] [easy] way to solve your [roach] problem
- 14 [Thin][] [clear][] adhesive strips
- 15 COMBAT® [Combat Flik R] [killing] [gel] [bait] [strips] for roaches
- 16 COMBAT® [Combat Flik R] [roach killing] [gel] [bait] [strips]
- 17 COMBAT® [*Combat Fluk R*] [roach kıllıng] [gel] [baɪt][s] [strɪps] [aren t] [are not] [tape] [or] [glue] [or sticky] [traps] [that] roaches stick to
- 18 [Inconspicuous] [and] [Discreet] [and easy to apply [anywhere] [where] [roaches [are] [may be] [a problem] [found]]
- 19 [Roach] [insecticide] [Gel] [bait] [in] [convenient][] [easy to use] [form] [strip][s]
- 20 [Roach killing] [gel] [bait] in [convenient][] [easy to use] [form] [strip][s]
- 21 Goes where <u>bait[s] [stations] [can t] [cannot]</u>
- 22 COMBAT® [Combat Flik R] [roach killing] [gel] [bait] [strips] go where bait stations can t
- 23 [The convenient] roach killing [bait] [gel] [form] [strip][s] [that] go[es] where bait stations can t
- 24 [Small Roach] [Large Roach] [ROACH]
- 25 [For [Kills] [both] [Small and Large] Roaches]
- 26 Gain control of your roach problem
- 27 Food [&][and][+] water [formulation][formula] attracts roaches to the [insecticide] [gel] [bait] [strips]
- 28 What roaches are looking for
- 29 With fipronil
- 30 COMBAT® s [potent] [roach killing] [insecticide] [gel] [bait][s] [strip][s] [with Fipronil]
- 31 Advanced [food] formula* * [versus][vs] the previous COMBAT® bait formula
- 32 COMBAT® **[Combat Flik R]** has [a] [specific] [combination of] roach food attractants and a [fast] [fast killing] [fast acting] [active ingredient] [insecticide] [to create] [and is] [making it] [a highly effective tool] [in the fight against roaches] [to kill roaches] [to fight your roach problem]
- 33 The [insecticide] [gel] [bait] attracts roaches in search of food and water [to the bait] [to the strip]
- 34 [COMBAT®] [insecticide] [Bait][s] [gel] [strips] [contain][s] [food and water] [for roaches] [roaches seek] [but] do not spill
- 35 Fast killing formula
- 36 Visible results overnight
- 37 Fast control of [even large] roaches
- 38 Starts [working] [killing] [roaches] in hours
- 39 COMBAT® [Combat Flik R] [roach killing] [gel] [bait] [strips] kill[s] roaches fast

Optional claims for front or back or side panel of label

- 40 Kills roaches continuously
- 41 Kılls [roaches] non stop
- 42 [Ongoing] [Non stop] roach control
- 43 Keeps [killing [roaches]] [working] until [it s] [the bait is] gone
- 44 Long residual action [for up to 3 months]
- 45 Keeps [working] [killing roaches] [for] up to 3 months
- 46 Provides round the clock protection [for up to 3 months]
- 47 Kıll roaches 24/7 [for up to 3 months]
- 48 Provides 24/7 [roach] protection [for up to 3 months]
- 49 Kills roaches while you sleep
- 50 Kills roaches for up to 3 months
- 51 [The] Domino Effect™
- 52 [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Get][s] [to] [the nest] [] [the source of [the] [your] [roach] problem]
- 53 [COMBAT®] [G[g]el] [bait][s] [strips] Kill[s] [roaches] [in hard to reach] [and] [inaccessible] [areas] [places]
- 54 [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches where they [hide] [breed] [live] [nest]
- 55 [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches you don t see
- 56 [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches [where] you can t see them
- 57 [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches you see and [those] [ones] you don t [see]
- 58 [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] [the roach] [roaches at the] source
- 59 [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches in the nest
- 60 [COMBAT®] [G[g]el] [bait][s] [strips] [Kills] [Stop][s] [Eliminate][s] [Destroy][s] the roach nest
- 61 [COMBAT®] [G[g]el] [bait][s] [strips] Lets roaches [Kill] [Stop] [Eliminate] [Destroy] [other] roaches
- 62 Roaches [take] [share] [It] [COMBAT®] [s Ingredients] [the] [Insecticide] [gel] [bait] [back to] [back at] [with] [In] the nest
- 63 Roaches share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the nest][] [killing other roaches] [and] [destroying the nest]
- 64 Roaches share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the nest][] [killing other roaches] [and] [destroying [the] [local] [your] [roach] population]
- 65 Roaches eat the [insecticide] [gel] [bait] and die in the nest
- 66 Roaches are attracted to the [insecticide] [bait] [gel] and take it back to their nest
- 67 Roaches ingest the [insecticide] [gel] [bait] and return to die in their nest
- 68 [Fast acting] formula [that] quickly kills roaches [in the nest]
- 69 Kills quickly and keeps on killing [roaches] [back at the nest]
- 70 Kills roaches [at their source] [in the nest]
- 71 Prevents roach reproduction
- 72 As [The] [Domino Effect[™]] [insecticide] [bait] [gel] spreads through the roach population [most] roaches are killed [and [still] others lose their ability to reproduce]

Optional claims for front or back or side panel of label

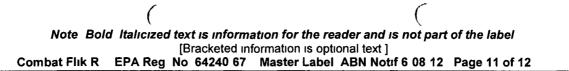
- 73 This product[s patented action formula] kills roaches
- 74 This product provides complete roach control
- 75 This product disrupts the reproductive cycle of roaches
- 76 Kills roaches while you sleep
- 77 Kills roaches for 3 months
- 78 [Kills] [Stops] [Eliminates] [indoor and outdoor (adjacent to the home)] roaches
- 79 [Kılls] [Stops] large roaches outdoors (adjacent to the home) before they come indoors [so that they don t] [and] [invade your home]
- 80 [Indoor and] Outdoor (adjacent to the home) [roach] control
- 81 [Ideal for] use with COMBAT® [another Combat product name]
- 82 [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® roach bait [station][s] products [for maximum control]
- 83 [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® roach gel[s] [products] [in syringe form] [for maximum control]
- 84 [Ideal for] use [in combination] with other COMBAT® roach [bait][s] [products] [for maximum control]
- 85 New [']
- 86 Kills fast [']
- 87 Works fast [']

<u>Value claıms</u>

Value claims below are only for packs with net contents greater than 6 baits but not to exceed 24

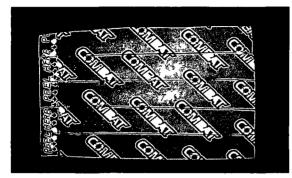
- Bonus Pack
- Value Pack
- [x][More]^{††} [Free] [Bonus] Baits^{††} [With Purchase]
- [x%] More^{††} [Free] [Bonus] Bait(s)^{††} [With Purchase]
- More Baits Better Value^{††}
- Value Pack More Baits^{††}
- Better Value^{††}
- More Baits^{††}

^{††}vs [standard] [x] [count][ct][package][pkg][of this product]

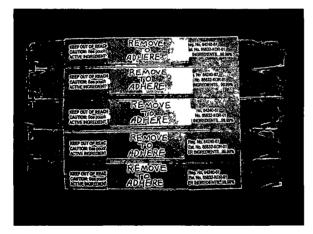


BAIT STRIP UNIT LABEL

Combat[®] Flik R



TOP VIEW - AS IT APPEARS BEFORE STRIPS ARE BROKEN APART *Text below is what will appear on strip* <u>Combat brand logo</u> <u>Peel Here</u>



BOTTOM VIEW – AS IT APPEARS BEFORE adhesive is removed Text below is what will appear on strip Batch code will be added to this label

KEEP OUT OF REACH OF CHILDREN CAUTION See Outer Carton for Complete Directions & Precautions Remove to Adhere (before removed) EPA Reg No 64240 67 EPA Est No 85632 KOR 001 ACTIVE INGREDIENT Fipronil 0 01%



TOP VIEW AS IT APPEARS AFTER PLACEMENT BUT NOT YET ACTIVATED Combat logo



TOP VIEW - AS IT APPEARS AFTER PLACEMENT AND ACTIVATION